
EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE UNIVERSITY,

Plaintiff,

vs.

STMICROELECTRONICS N.V., ET AL,

Defendants.

6:21–CV–727-ADA

JURY TRIAL DEMANDED

DEFENDANTS’ PROPOSED CLAIM CONSTRUCTIONS

In accordance with the Court’s Scheduling Order [ECF 45], Defendants STMicronics, Inc. and STMicronics N.V.¹ (referred to collectively herein as “the ST Defendants”) propose the following constructions for claim terms identified by the parties. To the extent that Plaintiff provides a proposed construction for any claim term withdrawn by the ST Defendants, the ST Defendants contend that such term should be given its plain-and-ordinary meaning. The ST Defendants also reserve the right to modify these proposed constructions, and to add/change terms being proposed for construction based on any additional information provided by Plaintiff.

’633 Patent

Term	Initial Proposed Construction
“A double-implanted metal-oxide semiconductor field-effect transistor” (claim 9)	The preamble is limiting
“less than about three micrometers” (claim 9)	Indefinite

¹ STMicronics N.V. is not subject to the Court’s jurisdiction, as detailed in its Motion to Dismiss [ECF 38]. And STMicronics International N.V. has not yet been served in this case and therefore is not properly before the Court and not subject to the Court’s jurisdiction.

'112 Patent

Term	Initial Proposed Construction
“a second, thicker oxide layer” (claim 1)	An oxidation layer formed, created or grown by reacting the gate, thicker than the first oxide layer,
“a gate oxide layer” (claim 6)	An oxidation layer formed, created or grown by reacting the gate

Dated: January 31, 2022

Respectfully submitted:

By: /s/ Justin S. Cohen

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STMICROELECTRONICS N.V.

CERTIFICATE OF SERVICE

I certify that on January 31, 2022, the foregoing document was served via electronic mail on counsel of record for Plaintiff.

/s/ Justin S. Cohen
Justin S. Cohen